

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

In re:

EARTHSNAP, INC.  
EIN: 87-0815236,

Debtor.

Case No. 24-60363

Chapter 7

---

**HI INVESTMENTS, LLC’S JOINDER TO  
PLANTSAP INC. AND DEJ PARTNERS, LLC’S  
JOINT OPPOSITION TO DEBTORS’ MOTION FOR RECONSIDERATION  
REGARDING ORDER CONVERTING CASES TO CHAPTER 7**

---

HI Investments, LLC (“**HI Investments**”), respectfully submits this Joinder (the “**Joinder**”) to PlantSnap Inc. (“**PlantSnap**”) and DEJ Partners, LLC’s (“**DEJP**”) *Joint Opposition to Debtors’ Motion for Reconsideration Regarding Order Converting Cases to Chapter 7* (Docket No. 180) (the “**Opposition**”)<sup>1</sup>, opposing *Debtors’ Motion for Reconsideration Regarding Order Converting Cases to Chapter 7* (Docket No. 176) (the “**Motion for Reconsideration**”). In support of this Joinder, HI Investments states as follows:

1. The Opposition is thorough and persuasive and provides the Court with a plethora of reasons to uphold its Order converting these cases to Chapter 7 and denying the Motion for Reconsideration. HI Investments joins in the arguments asserted in paragraphs 12 through 61 of the Opposition and incorporates them by reference as though set forth fully herein.

2. HI Investments files this separate Joinder to emphasize that it is a distinct party with distinct interests from PlantSnap and DEJP, notwithstanding repeated references to the

---

<sup>1</sup> Capitalized terms used herein and not otherwise defined shall have the meanings given to them in the Opposition.

contrary during the hearing on conversion to Chapter 7 and in the Motion for Reconsideration. Unlike PlantSnap and DEJP, HI Investments could not even reasonably be considered a competitor of the Debtors.<sup>2</sup> In fact, HI Investments is a minority owner with Mr. Ralls in Digital Earth Media, the parent company and 100% owner of EarthSnap. HI Investments has not been involved in multi-year state court litigation against the Debtors. Another critical distinction is that HI Investments has not asserted a secured claim in these cases and is arguably the largest unsecured creditor in these cases. In this respect, HI Investments is similarly situated to other general unsecured creditors—apart from the adversary proceeding HI Investments initiated against Mr. Ralls under section 523(a) of the Bankruptcy Code.

3. That said, HI Investments aligns with PlantSnap and DEJP on several fundamental issues. All three parties have been defrauded by Mr. Ralls and continue to suffer from his misconduct. They have uniformly lost confidence in Mr. Ralls as both a business partner and the steward of these bankruptcy estates. In a case riddled with fraud and asset co-mingling, no solution is perfect. However, given the choice between continuing with Mr. Ralls—who openly engages in improper co-mingling and ongoing fraud—and appointing a Chapter 7 trustee, HI Investments firmly believes that conversion and liquidation under Chapter 7 best serves its interests and those of all stakeholders in these bankruptcy proceedings.

WHEREFORE, HI Investments respectfully requests that the Court deny the Motion to Reconsider, and grant such other relief as the Court deems proper.

*[Remainder of page intentionally left blank.]*

---

<sup>2</sup> HI Investments understands that in the Opposition, PlantSnap and DEJP deny that they are competitors with the Debtors and HI Investments agrees with PlantSnap and DEJP that there is no evidence in the record to support the Debtors' allegations, but does not otherwise take a position on this issue.

Dated: May 27, 2025.

Respectfully submitted,

**BROWNSTEIN HYATT FARBER  
SCHRECK, LLP**

*/s/ Amalia Y. Sax-Bolder*

---

Amalia Y. Sax-Bolder, #54959

675 15th Street, Suite 2900

Denver, CO 80202

Tel: (303) 223-1100

Fax: (303) 223-1111

asax-bolder@bhfs.com

*Attorney for HI Investments, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of May, 2025, a true and correct copy of the foregoing **HI INVESTMENTS, LLC'S JOINDER TO PLANTSAP INC. AND DEJ PARTNERS, LLC'S JOINT OPPOSITION TO DEBTORS' MOTION FOR RECONSIDERATION REGARDING ORDER CONVERTING CASES TO CHAPTER 7** was transmitted by electronic means on the parties noted in the Court's ECF transmission facilities.

- **Patrick R. Akers** pakers@markuswilliams.com
- **Areya Aurzada** areya@holderlawpc.com
- **Diane Carter** dsbarron@rbarronlaw.com, dbc@trustesolutions.net
- **Victoria Forson** victoria.forson@klgates.com
- **Gregory W. Mitchell** greg@mitchellps.com
- **Brian T Peterson** brian.peterson@klgates.com
- **Dean E. Richardson** drichardson@gouldratner.com, mhuerta@gouldratner.com; mspinner@gouldratner.com; gould-ecfs\_notice@juralaw.net
- **Marcus Salitore** marc.f.salitore@usdoj.gov
- **Amalia Y Sax-Bolder** asax-bolder@bhfs.com, aciabattoni@bhfs.com; iblumberg@bhfs.com
- **Kevin S Wiley** kwiley@wileylawgroup.com

*/s/ AJ Ciabattoni*

AJ Ciabattoni, Legal Practice Assistant/Paralegal